

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO**

DEERFIELD BEACH NON-	)	
UNIFORMED MUNICIPAL	)	
EMPLOYEES RETIREMENT PLAN,	)	Civil Case No. 3:05-cv-1430-HL
Individually and On Behalf of All Others	)	
Similarly Situated,	)	

Plaintiff,

v.

DORAL FINANCIAL CORP.,	)	
SALOMON LEVIS, ZOILA LEVIS,	)	
RICARDO MELENDEZ, RICHARD F.	)	
BONINI, and EDGAR M. CULLMAN,	)	

Defendants.

CARLOS GARCIA FLORES, On Behalf	)	
of Himself and All Others Similarly	)	Civil Case No.3:05-CV-1464-CCC
Situated,	)	

Plaintiff,

v.

DORAL FINANCIAL CORP.,	)	
SALOMON LEVIS, RICARDO	)	
MELENDEZ, EDGAR M. CULLMAN,	)	
JR., ZOILA LEVIS, MARIO S. LEVIS,	)	
and PRICEWATERHOUSECOOPERS,	)	
LLP,	)	

Defendants.

**MOVANTS THE 1199 SEIU HEALTH CARE EMPLOYEES PENSION  
FUND AND ROBERT I. FOX'S NOTICE OF MOTION FOR  
CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFFS,  
LEAD COUNSEL AND LOCAL COUNSEL**

**PLEASE TAKE NOTICE** that pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), the 1199SEIU Health Care Employees Pension Fund, Activest Investmentgesellschaft mbH and Robert I. Fox (“Movants”) will move this Court, at a time and place to be determined, for an Order:

(1) consolidating the following related actions filed on behalf of the purchasers of the securities of Doral Financial Corp. (“Doral”):

<u>Case Name</u>	<u>Case No.</u>
<i>Deerfield Beach Non-Uniformed Municipal Employees Retirement Plan v. Doral Financial Corp., et al.</i>	3:05-cv-1430-HL
<i>Flores v. Doral Financial Corp., et al.</i>	3:05-cv-1464-CCC

(2) appointing Movants as Lead Plaintiffs in the above related actions pursuant to Section 21(D)(a)(3)(B) of the PSLRA; and

(3) approving Movants’ selection of Zwerling, Schachter & Zwerling, LLP as Lead Counsel and De Jesus Hey & Vargas as Local Counsel.

This motion is supported by the accompanying memorandum of law in support of the motion, the [proposed] order granting the motion, the affidavit of Richard A. Speirs in support of the motion and the exhibits attached thereto, all of the prior pleadings and proceedings had

herein, and such other written and/or oral argument as may be presented to the Court.

Dated: San Juan, Puerto Rico  
June 20, 2005

Respectfully submitted,

**DE JESUS HEY & VARGAS**

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